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February 22, 2012

MICHAEL F. CHILDERS, TREASURER DEMOCRATIC PARTY OF WISCONSIN 110 KING ST STE 203 MADISON, WI 53703

Response Due Date 03/28/2012

**IDENTIFICATION NUMBER: C00019331** 

REFERENCE: AUGUST MONTHLY REPORT (07/01/2011 - 07/31/2011)

## Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. Failure to adequately respond by the response date noted above could result in an audit or enforcement action. Additional information is needed for the following 5 item(s):

- 1. Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule(s) H4 of your report to clarify the following description(s): "Political consulting." For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).
- **2.** Please amend your report by providing the address for each disbursement itemized on Schedule(s) H4 supporting Line(s) 21(a). (11 CFR §§104.3(a)(4) and 104.10(4))
- **3.** Schedule H4 discloses reimbursements to "ADP" for "payroll- see memo" totaling \$195,097.88. However, the sum of the memo entries provided identifying the original vendor associated with these payments total \$196,247.88. Please amend your report to clarify this discrepancy.
- **4.** Schedule H4 supporting Line 21(a) of your report discloses payments made to credit card companies. Payments made to credit card companies must identify in memo entries, the original vendors from which you have purchased an item or service if your payments to these vendors have exceeded \$200 this year. Please amend your report by providing the name and mailing address of the original vendor, along with the date, amount and purpose of each payment as required by 11 CFR §104.9(b) and clearly identify on the Schedule B, which credit card payment each memo entry relates to.

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5. Schedule H4 of your report discloses a payment(s) for "Intern Stipend." Please be advised that a political committee may maintain a petty cash fund out of which it may make expenditures not in excess of \$100 to any person per purchase or transaction. (11 CFR §102.11) However, if this expenditure(s) represents an apparent reimbursement(s) to an individual(s) for apparent travel and subsistence advances in which the total amount reimbursed exceeds \$500, there are additional reporting requirements. Please provide clarifying information regarding this activity and amend your report to include any missing information as noted below.

When the reimbursement amount to staff for travel and subsistence advances exceeds \$500, the payments by committee staff that make up the reimbursement have to be itemized as memo entries regardless of the amount. Each memo entry must include the complete name and address of the original vendor, as well as the date, amount and an adequate purpose. Schedule H4 should clearly identify which reimbursement each memo entry relates to. (11 CFR §§104.10 and 104.17, and Advisory Opinion 1996-20, footnote 3)

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. Requests for extensions of time in which to respond will not be considered.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1143.

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Sincerely,

Kaitlin Eger

Senior Campaign Finance Analyst

Kaitlin E. Ser

Reports Analysis Division

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